

REMARKS

I. Introduction

Claims 1 to 8 are currently pending in this application. In view of the following remarks, it is respectfully submitted that all of the presently pending claims are allowable, and reconsideration is respectfully requested.

Applicants respectfully request that the Examiner enter the amendment to the Specification submitted on July 3, 2003.

II. Priority Date Which Application is Entitled To

A. Introduction

The Examiner asserts that the effective filing date for claims 1 to 8 is April 7, 1992, the filing date of continuation-in-part application serial no. 07/864,680 ("the '680 application"). The Examiner further asserts that the '680 application is the first application of Applicants' prior applications which discloses a printing plate having opposite ends and being wrapped about a plate cylinder. Applicants respectfully disagree and submit that claims 1 to 8 are entitled to the filing date of ancestor application serial no. 07/417,587 ("the '587 application"), filed on October 5, 1989, for the reasons set forth below.

To be entitled to the benefit of priority from an earlier-filed patent application 35 U.S.C. §120 generally requires the following:

1. The continuing and earlier applications must both be pending simultaneously at one point in time (i.e., the *copendency* requirement);
2. The earlier application must have at least one inventor in common with the continuing application;
3. The continuing application must contain a reference to the earlier application; and
4. The continuing application must be for the same invention that was adequately disclosed in the earlier application.

Applicants submit that the present application and the '587 application meet the copendency requirement and have at least one inventor in common. Applicants further submit that the present application contains a reference to the '587 application. Applicants further submit, for reasons detailed below, that the present application is for the same invention that was adequately disclosed in the ancestor '587 application.

B. The '587 application meets the description requirement of 35 U.S.C. § 112, first paragraph because the term "printing plate," as used in the '587 application, reasonably conveys to one skilled in the relevant art that Applicants, at the time the '587 application was filed, had possession of the claimed invention.

A claim in a CIP application is entitled to the filing date of the parent application when the claimed invention is described in the parent specification in a manner that satisfies, inter alia, the description requirement of 35 U.S.C. § 112. See *Therma-Tru Corp. v. Peachtree Doors Inc.*, 44 F.3d 988, 992 (Fed. Cir. 1995). The first paragraph of 35 U.S.C. § 112 merely requires that the specification reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. See *Eiselstein v. Frank*, 52 F.3d 1035, 1038-39 (Fed. Cir. 1995).

For the following reasons, Applicants respectfully submit that the '587 application reasonably conveys to one skilled in the art that Applicants, at the time of filing of the '587 application, had possession of a conventional printing plate, which has opposite ends and is adapted to be wrapped around a plate cylinder, as recited in claim 1, as well as a printing plate whose ends are mountable within an axially extending gap in the plate cylinder, as recited in claim 5.

1. The '587 application itself implies that "printing plate," as used in the '587 application, refers to a plate wrapped around the plate cylinder having opposite ends clamped in an axially extending gap in the plate cylinder.

Figure 1 of the '587 application shows upper and lower blanket cylinders 14 and 16. The '587 application discloses specialized means and methods for accessing the blanket cylinder for replacement of the tubular blanket. Specifically, the '587 application discloses a movable portion of the frame for providing access to one end of the blanket cylinder for replacement of the tubular blanket disposed on the blanket cylinder. See the paragraph spanning pages 25 and 26. It is respectfully submitted that the fact that the '587 application discloses specialized means and methods for replacing the tubular blanket on the blanket cylinder and does not disclose such means and methods for the plate cylinder, indicates that a conventional printing plate, i.e., a printing plate wrapped around the plate cylinder and having opposite ends clamped in an axially extending gap in the

plate cylinder, was mounted on the plate cylinder. Conventional printing plate do not require special means and access methods for replacement because they are wrapped around the print cylinder. If the printing cylinder, as disclosed, had a tubular printing plate it flows that the application would have disclosed a means, such as the movable frame portion, allowing for removal of such a tubular printing plate. Therefore, Applicants respectfully submit that the '587 application's disclosure of a special mounting means and methods used to replace the tubular blanket and lack of disclosure of such means and method for replacement of the printing plate, implies that no such special mounting means were necessary given the use of a conventional printing plate, having opposite ends clamped in an axially extending gap in the plate cylinder. Accordingly, it is respectfully submitted that the '587 application reasonably conveys to one skilled in the art that Applicants, at the time of filing of the '587 application, had possession of a conventional printing plate having opposite ends and wrapped around a plate cylinder, as recited in claim 1, as well as a printing plate whose ends are mountable within an axially extending gap in the plate cylinder, as recited in claim 5.

The Examiner alleges that certain teachings in the '587 application "imply a continuous uninterrupted surface on both the blanket cylinder and the plate cylinder." (Final Office Action at p. 4.) The Examiner refers to the following excerpt:

the rolling engagement between the blanket and printing plate on the plate cylinder 22 tends to be smooth and relatively vibration free.

(See the paragraph bridging pages 7 and 8.) However, this reference, when read in context, in no way implies a gapless plate cylinder. The full sentence reads as follows:

By forming the blanket 18 with a continuous outer surface which is free of gaps, the rolling engagement between the blanket and printing plate on the plate cylinder 22 tends to be smooth and relatively vibration free.

(See the paragraph bridging pages 7 and 8.) This excerpt merely compares rolling of the cylinders with and without a gap on the blanket cylinder and in no way implies a gapless plate cylinder.

The Examiner further refers to the following excerpt:

to promote smooth rolling engagement with the cylindrical outer surface 42 of the printing plate on the plate cylinder 18.

(See first full paragraph of page 8.) Here again, this reference, when read in context, in no way implies a gapless cylinder. The full sentence reads as follows:

A cylindrical outer surface 40 of the blanket 18 is continuous and free of gaps to promote smooth rolling engagement with the cylindrical outer surface 42 of the printing plate on the plate cylinder 18.

(See first full paragraph of page 8.) This sentence is merely comparing rolling of the cylinders with and without a gap on the blanket cylinder and in no way implies a gapless plate cylinder.

The Examiner further refers to the following excerpt:

Thus, an ink pattern can be applied to the surface 40 of the blanket cylinder throughout the entire area of the surface 40.

(See the second full paragraph of page 8.) However, this excerpt also in no way implies a gapless cylinder. The excerpt merely points to the fact that given the elimination of the gap on the blanket cylinder ink can extend across an area where the gap was previously formed. This is supported by the sentence that follows the excerpt, which reads:

The ink pattern can extend across an area where a gap was previously formed in the surface of known blanket cylinders.

(See the second full paragraph of page 8.) Therefore, the '587 application does not "imply a continuous uninterrupted surface on both the blanket cylinder and the plate cylinder." (Final Office Action at p. 4.) On the contrary, for the reasons detailed herein, Applicants respectfully submit that the '587 application reasonably conveys to one skilled in the art that Applicants, at the time of filing of the '587 application, had possession of a conventional printing plate having opposite ends and wrapped around a plate cylinder, as recited in claim 1, as well as a printing plate whose ends are mountable within an axially extending gap in the plate cylinder, as recited in claim 5.

2. The term “printing plate” itself, as used in the ‘587 application, given its art recognized meaning, reasonably conveys to a person of ordinary skill that Applicants, at the time of filing of the ‘587 application, were in possession of a printing plate wrapped around a plate cylinder having opposite ends mountable within an axially extending gap in the plate cylinder.

It is also respectfully submitted that the disclosure in the ancestor ‘587 application of a “printing plate” mounted on a plate cylinder would, given the art recognized meaning of the term “printing plate” detailed below, reasonably convey to a person of ordinary skill that Applicants, at the time of filing of the ‘587 application, were in possession of a printing plate wrapped around a plate cylinder having opposite ends mountable within an axially extending gap in the plate cylinder. Figure 1 of the ‘587 application shows plate cylinders 22 and 24. The surface of the printing plate mounted on cylinder 22 is indicated by reference numeral 42. Further, the specification at p. 6, lines 25 to 26, states that “[u]pper and lower plate cylinders 22 and 24 support printing plates.”

Applicants refer the Examiner to the declaration of Harvey Levenson, Ph.D., an expert in the printing art, herein submitted and attached as Exhibit B (“Third Levenson Dec.”). In October, 1989, the time of filing of the ancestor application, offset lithographic printing plates were in the form of flat, thin, rectangular sheets having opposite ends. (Third Levenson Dec. ¶6.) In use, the plate was mounted to the surface of a plate cylinder of a printing unit of a printing press. (Third Levenson Dec. ¶6.) To mount the flat plate on the surface of the plate cylinder, one must have necessarily wrapped the plate around the cylinder. (Third Levenson Dec. ¶6.) Typically the opposite ends of the printing plate were clamped in a clamping gap running axially along the surface of the cylinder. (Third Levenson Dec. ¶6.)

According to a 1989-dated printing manual, “[e]ach printing couple on a blanket-to-blanket web offset lithographic press consists of four basic elements[,]” including a dampening system, an inking system, a plate cylinder, on which a printing plate is mounted, and a blanket cylinder. David B. Crouse & Robert J. Schneider, Jr., *Web Offset Press Operating*, p. 15 (3rd ed. 1989) (see Third Levenson Dec., Exh. B at p. 15) The plate is specifically stated to be “a thin metal sheet that wraps around the cylinder surface and carries the image.” (Third

Levenson Dec. Exh. B at p. 15) The plate has a leading edge and a trailing edge, which are clamped in a lockup mechanism housed in a deep gap running across the cylinder. (Third Levenson Dec., Exh. B at pp. 16-17.) Regarding the printing cylinder, the printing manual states:

The basic features of all plate cylinders are the same. Almost all have **bearers**: smooth, flat metal rings at the extreme ends of the cylinder. Just inside each bearer (between the bearer and cylinder body) is a narrow groove, called the **gutter**. Between the two gutters is the **body**--the main portion of the cylinder on which the plate and packing are mounted.

(Third Levenson Dec. Exh. B at p. 15) In summary, the printing manual states that one of the basic features of all plate cylinders is a body on which a plate is mounted. The plate mounting is stated to involve wrapping the plate around the plate cylinder and locking a leading and trailing edges of the plate in a deep gap running across the cylinder.

In view of the above, and based on the Third Levenson Dec., Applicants respectfully submit that the term "printing plate" had a recognized meaning in the lithographic printing art in October 1989: a thin, flat, rectangular sheet-shaped lithographic image carrier having opposite ends. Applicants further submit that in October 1989, and up to the present day, a person of ordinary skill in the art would know that mounting a printing plate on a plate cylinder necessarily entails wrapping the plate around the cylinder and clamping the ends in a clamping gap running axially along the surface of the cylinder. (See Third Levenson Dec. ¶18.) In fact, the Examiner has already admitted to the "conventionality of a . . . printing plate (28 or 30) wrapped around a plate cylinder (24 or 26) and the plate having opposite ends inserted into a gap (44 or 46) of the plate cylinder". Final Office Action at p. 2 (emphasis added).

Therefore, as indicated above, Applicants respectfully submit that given the art recognized meaning of the term "printing plate," the disclosure in the ancestor '587 application of a "printing plate" mounted on a plate cylinder would reasonably convey to a person of ordinary skill that Applicants, at the time of filing of the '587 application, were in possession of a printing plate wrapped around a plate

cylinder having opposite ends mountable within an axially extending gap in the plate cylinder.

U.S. Patent No. 4,953,461 ("Gaffney et al. '461"), currently cited against pending claims 1 to 8, which issued from an application originally filed in the United States in 1988, further reinforces Applicants' argument that a printing plate mounted on a plate cylinder, as described in the '587 specification, reasonably conveys to one skilled in the relevant art that the inventors in October 1989 had possession of the claimed invention, including a printing plate wrapped around a printing cylinder having opposite ends mountable in a axially extending gap in the plate cylinder. In describing the printing plate and its connection to the printing cylinder Gaffney et al. '461 state the following:

A pair of plate cylinders 24 and 26 carry printing plates 28 and 30 having cylindrical peripheral surfaces which engage the surfaces 16 and 18 of the blanket cylinders 12 and 14.

(Gaffney, col. 2, lines 45-48 and Figure 1.) Further, when describing the problem relating to gaps created by the printing plates Gaffney et al. '461 mention that opposite ends of the printing plates repeatedly impact the blanket cylinders. (See Gaffney, col. 3, lines 6-15.) Thus, Applicants submit that those skilled in the art, at the time of filing of the '587 application, appreciated the term "printing plate" to mean a flat metal sheet that wraps around a plate cylinder and has opposite ends that are mountable in an axially extending gap in the plate cylinder.

U.S. Patent No. 3,166,013 ("Wyllie et al."), cited by the Examiner, purportedly discloses an expansible cylinder for a rotary printing press. (See Final Office Action at p. 4.) A tubular printing plate is stated to be secured on a base cylinder by expansion thereof. (See Wyllie et al, col. 1, lines 27-31, attached to the Third Levenson Dec. as Exh. D.) Applicants submit that the fact that a tubular printing plate may have been disclosed by Wyllie et al. does not change the art recognized meaning of the term "printing plate" nor does it change the fact that the '587 application would indicate to a person skilled in the art that Applicants were in possession of a printing plate, wrapped about a plate cylinder and having opposite ends clamped in a clamping gap running radially along the surface of the plate cylinder to which it is mounted, at the time of filing of the ancestor application.

The purported tubular printing plate of Wyllie et al. was not commercialized or well known to those of ordinary skill in the art at the time of filing of the ancestor application. (Third Levenson Dec. ¶11.) Given the conventionality and widespread use of the flat, thin, rectangular sheet having opposite ends at the time of filing of the ancestor application, Applicants submit that use of the term "printing plates," in the ancestor application, would indicate to a person skilled in the art that Applicants, at the time of filing of the ancestor application, were in possession of a printing plate wrapped about a plate cylinder and having opposite ends clamped in a clamping gap running radially along the surface of the plate cylinder to which it is mounted. This is because, as indicated above, the term "printing plate" had a recognized meaning in the lithographic printing art in October 1989: a thin, flat, rectangular sheet-shaped lithographic image carrier having opposite ends mountable in a radially extending gap in a plate cylinder. (Third Levenson Dec. ¶11.)

The Final Office Action further references U.S. Patent No. 4,823,697 ("Randazzo") which relates to a magnetic plate cylinder. (See Final Office Action at p. 4 and the Third Levenson Dec., Exh. E.) Randazzo discloses a printing plate cylinder have permanent magnets disposed therein and having a cylindrical configuration. (See Randazzo Abstract.) Randazzo further discloses a rectangular printing plate having edges 53 and 55 wrapped around the printing cylinder. (See Randazzo, col. 5, lines 54-56.) The plate is stated to be mounted and secured to the plate cylinder via a magnetic force. (See Randazzo Abstract.) Accordingly, Applicants respectfully submit that use of the term "printing plate" in Randazzo is consistent with the Applicants argument that one of ordinary skill in the art would have appreciated the recitation of a printing plate mounted on a plate cylinder in the '587 application to convey a printing plate wrapped around a plate cylinder and having opposite ends, as recited in claim 1.

The ends of the plate in Randazzo are magnetically fixed to the plate cylinder as opposed to being clamped in a radially extending axial gap in the plate cylinder, as recited in claim 5. However, given the conventionality and widespread use of the flat, thin, rectangular sheet having opposite ends mountable in a radially extending gap in the plate cylinder at the time of filing of the ancestor application, Applicants submit that use of the term "printing plate" in the ancestor application, would still indicate to a person skilled in the art that Applicants were in possession of

a printing plate, wrapped about a plate cylinder and having opposite ends clamped in a clamping gap running radially along the surface of the plate cylinder to which it is mounted, at the time of filing of the ancestor application. This is because (i) the magnetic printing plate of Randazzo was not commercialized or well known to those of ordinary skill in the art at the time of filing of the ancestor application, and (ii) the term "printing plate" had a recognized meaning in the lithographic printing art in October 1989, at the time of filing of the '587 application: a thin, flat, rectangular sheet-shaped lithographic image carrier having opposite ends mountable in a radially extending gap in a plate cylinder. (See Third Levenson Dec. ¶15.)

The Final Office Action further alleges that Randazzo discloses "in column 1 lines 6 - 22 the desirability of eliminating the axially extending gap in a plate cylinder." (Final Office Action at p. 4.) However, this assertion only supports Applicants' position. Specifically, if there was a known desire to eliminate the axially extending gap in a plate cylinder in 1988, when Randazzo was filed, then one would expect the person of ordinary skill in the art at the time of filing of the '587 application to have appreciated recitation of a printing plate mounted on a plate cylinder in the '587 application to convey a printing plate having opposite ends and wrapped around a plate cylinder, as recited in claim 1, and a plate having opposite ends mounted in an axially extending gap in the plate cylinder, as recited in claim 5.

The Examiner further relies on U.S. Patent No. 4,807,527 ("Knauer"). (See Final Office Action at p. 4 and the Third Levenson Dec., Exh. F.) Knauer relates to a printing machine cylinder holder arrangement designed to facilitate re-sleeving of rubber blanket cylinder with a new cover. (See Knauer, col. 2, lines 30-33.) The Final Office Action references column 1, lines 19-25 and alleges that Knauer teaches that a printing plate may be in the form of a sleeve. (See Final Office Action at p. 4.) Knauer states that "Ser. No. 07/150,089, filed Jan. 29, 1988, KOBLE, describes an arrangement of re-sleeve a cylinder with a sleeve which may include. . .a printing plate." (Knauer, col. 1, lines 19-22.) Respectfully, Knauer does not teach that the printing plate may be in the form of a sleeve. Rather, Knauer merely states that the cylinder sleeve "may include" a printing plate. (Knauer, col. 1, line 21.) The printing plate, however, may be a conventional printing plate having opposite ends that is wrapped around the sleeve and inserted into an axially extending gap in the sleeve. Knauer does not indicate either way.

Notwithstanding the above, as indicated above with respect to Randazzo, Applicants submit that use of the language "[u]pper and lower plate cylinders 22 and 24 support printing plates," in the ancestor application, would still indicate to a person skilled in the art that Applicants were in possession of a printing plate, wrapped about a plate cylinder and having opposite ends clamped in a clamping gap running radially along the surface of the plate cylinder to which it is mounted, at the time of filing of the ancestor application. This is because (i) the printing plate discussed in Knauer was not commercialized or well known to those of ordinary skill in the art at the time of filing of the ancestor application, and (ii) the term "printing plate" had a recognized meaning in the lithographic printing art in October 1989, at the time of filing of the '587 application: a thin, flat, rectangular sheet-shaped lithographic image carrier having opposite ends mountable in a radially extending gap in a plate cylinder. (See Third Levenson Dec. ¶15.)

U.S. Patent No. Re 34,970 to Tittgemeyer ("Tittgemeyer") teaches an endless image carrier as an alternative to the conventional flat, thin, rectangular plate having opposite ends. (See Third Levenson Dec., Exh. C.) Tittgemeyer studiously avoids using the word "plate" to refer to its endless image carrier. Instead, Tittgemeyer uses the terms "print form" and "printing form" as a generic designation for image carrier, and "plate" for the flat, clamped plates of the prior art:

In offset printing processes, plates mounted on carrier cylinders fixedly installed in a printing unit are used. Clamping segments extended through the carrier cylinder are used to mount the plates. The plates begin and end within the extent of these clamping segments, accordingly the print carrier location corresponding to an end or a beginning of the printing form is recognizable.

(Tittgemeyer, col. 1, lines 27-33 (emphasis added).) In one disclosed embodiment, the endless image carrier of Tittgemeyer is sleeve-shaped. Tittgemeyer refers to that embodiment as a "sleeve" or "sleeve-shaped printing [or print] form," but never as a "plate." In an alternative embodiment, the image carrier is a cylinder jacket, or shell. (Tittgemeyer, Figure 6.) Tittgemeyer never refers to that embodiment as a "plate," either.

It is consistent with the conventional nature of a printing plate, i.e., flat, thin, rectangular sheet of metal that is wrapped around a plate cylinder and is

clamped into position, that references to an alternately configured printing plate use an alternate name for the plate such as "print form", as in Tittgemeyer, or add an appropriate descriptor to the term, e.g., "tubular printing plate," as in Wyllie et al. or "magnetic" as in Randazzo, so as to distinguish it from the conventional "printing plate."

Therefore, as indicated above, Applicants respectfully submit that given the art recognized meaning of the term "printing plate," the disclosure in the ancestor '587 application of a "printing plate" mounted on a plate cylinder would reasonably convey to a person of ordinary skill that Applicants, at the time of filing of the '587 application, were in possession of a printing plate wrapped around a plate cylinder having opposite ends mountable within an axially extending gap in the plate cylinder.

3. Summary

In summary, given (i) the use of the term "printing plate" in the '587 application, which has the art recognized meaning of a thin, flat, rectangular sheet-shaped lithographic image carrier having opposite ends mountable within an axially extending gap in the plate cylinder, as well as (ii) the lack of discussion, as detailed above, regarding specialized means and methods for replacing a tubular printing plate on the plate cylinder paralleling that for the blanket cylinder and tubular blanket, one skilled in the art would recognize that, at the time of filing of the '587 application, Applicants were in possession of a printing plate wrapped around a plate cylinder and having opposite ends mountable within an axially extending gap in the plate cylinder.

Accordingly, Applicants respectfully submit that claims 1 to 8 of the present application are entitled to an effective priority date of October 5, 1989, the filing date of the ancestor '587 application.

C. Applicants submit that being wrapped around a plate cylinder and having opposite ends mounted within an axially extending gap in the plate cylinder is an inherent property of printing plates.

"If matter added through amendment to a C-I-P application is deemed inherent in whatever the original parent application discloses. . .that matter. . .is entitled to the filing date of the original, parent application." *Litton Sys., Inc. v. Whirlpool Corp.*, 728 F.2d 1423, 1438 (Fed. Cir. 1984). See also *TurboCare Div. of Demag Delaval Turbomachinery Corp. v. GE*, 264 F.3d 1111, 1118 (Fed. Cir. 2001). Further, the later explicit description of an inherent property does not deprive the product of the benefit of the filing date of the earlier application. See *Kennecott Corp. v. Kyocera Int'l Inc.*, 835 F.2d 1419, 422-23 (Fed. Cir. 1987), cert. denied, 486 U.S. 1008, 100 L. Ed. 2d 198, 108 S. Ct. 1735 (1988).

As indicated above, according to a 1989-dated printing manual, one of the basic features of all conventional plate cylinders is a body on which a plate is mounted. The plate mounting is stated to involve wrapping the plate around the plate cylinder and locking a leading and trailing edges of the plate in a gap running across the cylinder. (See Third Levenson Dec. ¶¶7 and Exh. B). Based on the above and Dr. Levenson's opinion, Applicants submit that having opposite ends and being adapted to be wrapped around a printing cylinder were, and still remain, inherent properties of a conventional printing plate at the time of filing of the '587 application. (See Third Levenson Dec. ¶¶8.) Accordingly, these inherent details of the printing plate are entitled to the filing date of the '587 application. Further, Applicants' more explicit description of the printing plate in the '680 application does not deprive Applicants of the earlier filing date of the '587 application. See *Kennecott Corp.*, *supra*.

Accordingly, Applicants respectfully submit that claim 1 of the present application is entitled to an effective priority date of October 5, 1989, the filing date of the '587 application.

III. Rejection of Claims 1 to 8 Under 35 U.S.C. § 103 (a)

Claims 1 to 8 were rejected under 35 U.S.C. §103(a) as being obvious over CA 2,026,954 ("Gaffney et al. '954") in view of Gaffney et al. '461. Claims 1 to 8 were also rejected under 35 U.S.C. §103(a) as being obvious over Gaffney et al. '461 in view of Gaffney et al. '954.

For the reasons set forth above, Applicants respectfully submit that Gaffney et al. '954 does not constitute prior art against claims 1 to 8. As indicated above, claims 1 to 8 of the present application are entitled to an effective priority date of October 5, 1989, the priority date of application serial no. 07/417,587, which is before the April 10, 1990 filing date of Gaffney et al. '954.

Applicants note that the Examiner's reliance on Gaffney et al. '461 in the 35 U.S.C. §103(a) rejection of claims 1 to 8 to establish the "conventionality of a blanket on a blanket cylinder (12 or 14) having a continuous surface (16 or 18) and a printing plate (28 or 30) wrapped around a plate cylinder (24 or 26) and the plate having opposite ends inserted into a gap (44 or 46) of the plate cylinder", see Final Office Action at p. 2 (emphasis added), is inconsistent with the Examiner's current position regarding Applicants claim to the priority date of the '587 application. The Examiner is, in effect, acknowledging that one of ordinary skill in the art in 1989 would have appreciated that a printing plate mounted on a plate cylinder, as described in the '587 application, would indicate to one skilled in the art that the Applicants, on the filing date of the '587 application, had possession of the claimed invention, including a printing plate wrapped around a printing cylinder having opposite ends mountable within an axially extending gap in the plate cylinder.

Therefore, withdrawal of the 35 U.S.C. §103(a) rejection and allowance of claims 1 to 8 is respectfully requested.

IV. Conclusion

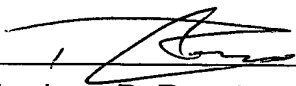
It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

KENYON & KENYON

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By: _____


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